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Attorneys for Defendant
Aviation Services (CNMI), Ltd. dba Freedom Air

UNITED STATES DISTRICT COURT
FOR THE
NORTHERN MARIANA ISLANDS

MOSES T. FEJERAN and
QIANYAN S. FEJERAN,

Plaintiffs,

vs.

AVIATION SERVICES (CNMI), LTD.
dba FREEDOM AIR,

Defendant.

CIVIL ACTION NO. 05-0033

**DECLARATION OF DAVID LEDGER
IN SUPPORT OF DEFENDANT'S
OPPOSITION TO PLAINTIFFS
MOTION IN LIMINE TO EXCLUDE
TESTIMONY OR EVIDENCE OF ANY
AFFIRMATIVE DEFENSE NOT
EXPLICITLY STATED IN THEIR
ANSWER; EXHIBITS A-G**

**HEARING DATE: AUGUST 21, 2007
TIME: 9:30 A.M.**

I, DAVID LEDGER, declare under penalty of perjury that the following statements are true and correct:

1. I have personal knowledge of the facts stated in this declaration except as otherwise indicated.

2. I would testify competently to these facts if called by the Court to do so.

3. I am licensed to practice law in the Commonwealth of the Northern Mariana Islands and am admitted to this Court.

1 4. I am the attorney for Aviation Services (CNMI), Ltd. dba Freedom Air.

2 5. Attached hereto as Exhibit A is a true and correct copy of Defendant's Responses
3 to Plaintiffs' First Set of Interrogatories.

4 6. Attached hereto as Exhibit B is a true and correct copy of Defendant's Third
5 Supplemental Rule 26 Disclosures.

6 7. Attached hereto as Exhibit C is a true and correct copy of Defendant's Second
7 Supplemental Responses to Plaintiff Qianyan S. Fejeran's First Set of Discovery Requests -
8 Interrogatories.

9 8. Attached hereto as Exhibit D is a true and correct copy of Richard T. Gill's expert
10 report.

11 9. Attached hereto as Exhibit E is a true and correct copy of the pertinent pages of
12 the deposition transcript of Richard R. Gill.

13 10. Attached hereto as Exhibit F is a true and correct copy of the pertinent pages of
14 the deposition transcript of Frank A. Perez.

15 11. Attached hereto as Exhibit G is a true and correct copy of Declaration of Richard
16 Brown filed on July 26, 2007.

17 I declare under penalty of perjury that the foregoing is true, correct and complete.

18 EXECUTED: August 16, 2007.

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DAVID LEDGER

EXHIBIT A

1 CARLSMITH BALL LLP
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4 Capitol Hill
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11

12 UNITED STATES DISTRICT COURT
13 FOR THE
14 NORTHERN MARIANA ISLANDS
15

16 MOSES T. FEJERAN and
17 QIANYAN S. FEJERAN,

18 Plaintiffs,

19 vs.

20 AVIATION SERVICES (CNMI), LTD.
21 dba FREEDOM AIR,

22 Defendant.
23

CIVIL ACTION NO. 05-0033

DEFENDANT'S RESPONSE TO
PLAINTIFFS FIRST SET OF
INTERROGATORIES;
VERIFICATION; CERTIFICATE
OF SERVICE

24 Defendant Aviation Services (CNMI), Ltd. dba Freedom Air, hereby responds to
25 Plaintiffs First Set of Interrogatories as follows:
26

27 Interrogatory No. 1: Please DESCRIBE IN DETAIL any and all policies and/or
28 procedures, either written or spoken, official or unofficial, that YOU had in force at the time of
the OCCURRENCE to ensure that the methods and instrumentalities by which passengers
embark and/or disembark from YOUR aircraft are reasonably safe.

Response to Interrogatory No. 1: Please refer to FAR 121.131 et seq.. In addition,
passengers are instructed to use caution when using the aircraft stair and to use the handrail.

1 When passengers use the stair an airline employee (ground agent) is stationed there to assist.

2
3 Interrogatory No. 2: Please DESCRIBE IN DETAIL any policy or procedure, written or
4 spoken, official or unofficial, that YOU had in force at the time of the OCCURRENCE that
5 governed the actions of YOUR employees when a passenger on any of YOUR aircraft would be
6 injured in any way.

7 Response to Interrogatory No. 2: Please refer to FAR 121.131 et seq.. Employees are
8 trained to respond to passenger incident situations. Exactly how the employee responds depends
9 on the nature of the incident. Obviously, the focus of the training and response is the safety and
10 well-being of the passenger. In this instance, the passenger was asked if he was okay and he said
11 yes. The passenger was nonetheless offered assistance and a medical check-up, which were
12 declined. The passenger was also offered use of a wheelchair, which was likewise declined. The
13 passenger was also invited to seek any help or assistance he might later need at the airline
14 counter, but none was requested.

15
16 Interrogatory No. 3: Please DESCRIBE IN DETAIL any policy or procedure, written or
17 spoken, official or unofficial, that YOU had in force at the time of the OCCURRENCE that
18 governed any post-accident review of safety procedures and/or any post-accident inspection of
19 equipment.

20 Response to Interrogatory No. 3: Please refer to FAR 121.135(22). The incident reports
21 for this incident will be produced in discovery.

22
23 Interrogatory No. 4: Please IDENTIFY any and all PERSON(s) to YOUR knowledge
24 who have, in the last ten (10) years, slipped, tripped, fallen or otherwise had any accident, or
25 have complained of having any such accident, while embarking or disembarking from any of
26 YOUR aircraft regardless of the method or instrumentality used in said embarkation or
27 disembarkation and regardless of whether or not that particular PERSON suffered any injury or
28 not.

1 Response to Interrogatory No. 4: Defendant objects to this interrogatory on the grounds
2 that it is vague and overly broad as to scope and time frame, in particular, with regard to "any
3 accident" in the past "10 years". Subject to and without waiving the objection, the following
4 persons have been involved in embarkation and disembarkation incidents during the past five (5)
5 years: None

6
7 Interrogatory No. 5: Please DESCRIBE IN DETAIL the actions taken by YOUR
8 employees in response to any incident in which any PERSON, in the last ten (10) years, slipped,
9 tripped, fell or otherwise had any accident, or have complained of any such accident, while
10 embarking or disembarking from any of your aircraft regardless of the method of the method or
11 instrumentality used in said embarkation or disembarkation regardless of whether or not that
12 particular PERSON suffered any injury or not. In so describing:

- 13 a. IDENTIFY whatever employees were involved in said response(s),
14 b. DESCRIBE IN DETAIL the actions that they took,
15 c. DESCRIBE IN DETAIL any DOCUMENTATION that said employees generated
16 in responding to any such incident,
17 d. And, DESCRIBE IN DETAIL any subsequent changes in any of YOUR policies
18 and/or procedures, spoken or written, official or unofficial, undertaken as a result of any said
19 incidents.

20 Response to Interrogatory No. 5: Defendant objects to this interrogatory on the grounds
21 that it is vague and overly broad as to scope and time frame, in particular, with regard to "any
22 accident" in the past "10 years". Subject to and without waiving the objection, please see the
23 following information for embarkation and disembarkation incidents during the past five (5)
24 years: Not applicable.

25
26 Interrogatory No. 6: Please DESCRIBE IN DETAIL ALL FACTS YOU contend are
27 RELEVANT TO YOUR general and specific denial that DEFENDANT breached its duty to
28 maintain the methods and/or instrumentalities used by YOUR passengers to embark upon and

1 disembark from YOUR aircraft in a reasonably safe manner as stated in YOUR Answer.

2 Response to Interrogatory No. 6: There was nothing wrong with the aircraft stair and the
3 proper warnings and cautions were given to the passengers concerning use of the stair. Said
4 another way, the no-breach-of-duty defense is established by the *absence* of any fact which
5 would show or event tend to show any unlawful act or omission on the part of Defendant. It is
6 Plaintiff's burden to establish fact sufficient to prove negligence, yet Plaintiff has no such facts.
7 On the other hand, there are facts which show or tend to show that the passenger was not paying
8 attention to the situation and not looking out for his own safety. Additional facts may become
9 apparent through discovery.

10
11 Interrogatory No. 7: Please IDENTIFY all PERSONS YOU contend have knowledge
12 RELEVANT TO YOUR general and specific denials that DEFENDANT breached its duty to
13 maintain the methods and/or instrumentalities used by YOUR passengers to embark upon and
14 disembark from YOUR aircraft in a reasonable safe manner as stated in YOUR Answer.

15 Response to Interrogatory No. 7: Please refer to the names which appear on the incident
16 reports and statements produced by Defendant and the names disclosed in Defendant's Initial
17 Disclosures. Additionally, Richard Brown, Director of Operations, and a safety expert yet to be
18 retained and identified.

19
20 Interrogatory No. 8: Please IDENTIFY all DOCUMENTS YOU contend are
21 RELEVANT TO YOUR general and specific denials that DEFENDANT breached its duty to
22 maintain the methods and/or instrumentalities used by YOUR passengers to embark upon and
23 disembark from YOUR aircraft in a reasonably safe manner as stated in YOUR Answer.

24
25 Response to Interrogatory No. 8: Please refer to FAR 121.131 et seq.. Additionally, all
26 documents disclosed and/or produced in discovery, such as witness statements and incident
27 reports. Additional documents and expert witness reports may yet be forthcoming.

1 Interrogatory No. 9: Please DESCRIBE IN DETAIL ALL FACTS YOU contend are
2 RELEVANT TO YOUR general and specific allegations that the injuries sustained by Plaintiff
3 Moses Fejeran are attributable wholly or in part to his own fault as stated in YOUR Answer.

4 Response to Interrogatory No. 9: Please refer to the answer to interrogatory No. 6
5 above. Additional facts may become apparent through discovery.

6
7 Interrogatory No. 10: Please IDENTIFY all PERSONS YOU contend have knowledge
8 RELEVANT TO YOUR general and specific allegations that the injuries sustained by Plaintiff
9 Moses Fejeran are attributable wholly or in part to his own fault as stated in YOUR Answer.

10 Response to Interrogatory No. 10: Please refer to the names which appear on the
11 incident reports and statements produced by Defendant and the names disclosed in Defendant's
12 Initial Disclosures.

13
14 Interrogatory No. 11: Please IDENTIFY all DOCUMENTS YOU contend are
15 RELEVANT TO YOUR general and specific allegations that the injuries sustained by Plaintiff
16 Moses Fejeran are attributable wholly or in part to his own fault as stated in YOUR Answer.

17 Response to Interrogatory No. 11: All documents disclosed and/or produced in
18 discovery, such as witness statements and incident reports. Additional documents and expert
19 witness reports may yet be forthcoming.

20
21 Interrogatory No. 12: Please DESCRIBE IN DETAIL ALL FACTS YOU contend
22 support your allegation that this civil action "arises under a treaty of the United States,
23 specifically the Warsaw Convention" as stated in Defendant's Notice of Removal filed
24
25 previously with the United States District Court for the Northern Mariana Islands and as alleged
26 in YOUR Answer.

27 Response to Interrogatory No. 12: Defendant objects to this interrogatory on the
28 grounds that it is not reasonably calculated to lead to the discovery of admissible evidence.

1 Subject to and without waiving the objection, the flight in question operated between the CNMI
2 and Guam, thus subjecting it to rules and treaties governing international flights.

3
4 Interrogatory No. 13: Please IDENTIFY all FACTS YOU contend support your
5 allegation that this civil action "arises under a treaty of the United States, specifically the
6 Warsaw Convention" as stated in Defendant's Notice of Removal filed previously with the
7 United States District Court for the Northern Mariana Islands and as alleged in YOUR Answer.

8 Response to Interrogatory No. 13: Defendant objects to this interrogatory on the
9 grounds that it is not reasonably calculated to lead to the discovery of admissible evidence.
10 Subject to and without waiving the objection, the flight in question operated between the CNMI
11 and Guam, thus subjecting it to rules and treaties governing international flights.

12
13 Interrogatory No. 14: Please IDENTIFY all DOCUMENTS YOU contend support your
14 allegation that this civil action "arises under a treaty of the United States, specifically the
15 Warsaw Convention" as stated in Defendant's Notice of Removal filed previously with the
16 United States District Court for the Northern Mariana Islands and as alleged in YOUR Answer.

17 Response to Interrogatory No. 14: Please refer to the Warsaw Convention and the
18 amendments and protocols thereto.

19
20 Interrogatory No. 15: Please IDENTIFY all engineers, contractors, builders, and
21 subcontractors involved in the design, construction, and any modifications of the STAIRCASE,
22 or any other similar instrumentality used for disembarkation from or embarkation on to any of
23 YOUR aircraft.

24
25 Response to Interrogatory No. 15: In terms of the stair being an individual component of
26 the aircraft, we do not know who "designed" or "built" the stair. The folding stair is an integral
27 part of the aircraft, which is presumably purchased and installed on the aircraft by the aircraft
28 manufacturer prior to the aircraft being delivered to a purchaser. The stair has not to our

1 knowledge been modified from its original design and installation on the aircraft.

2
3 Interrogatory No. 16: Please IDENTIFY each and every incident in which a PERSON
4 was injured in anyway while on-board, embarking, disembarking or waiting to embark or
5 disembark any of YOUR aircraft anywhere in the Mariana Islands (including Saipan, Tinian,
6 Rota and Guam) during the past 10 (ten) years.

7 Response to Interrogatory No. 16: Defendant objects to this interrogatory on grounds
8 that it is overly broad as to scope and time frame. Subject to and without waiving the objection,
9 please see the following information for embarkation and disembarkation incidents during the
10 past five (5) years: Not applicable.

11
12 Interrogatory No. 17: What is YOUR version of how the OCCURRENCE happened?

13 Response to Interrogatory No. 17: Please refer to the statements of the eye-witnesses,
14 which have been disclosed and produced in discovery. Nothing external to the passenger caused
15 or contributed to cause the incident. Rather, Plaintiff failed to reasonably look out for his own
16 safety.

17
18 Interrogatory No. 18: Please DESCRIBE IN DETAIL ALL FACTS which YOU
19 contend support your allegation that Plaintiffs' have failed to state a valid cause of action.

20 ///

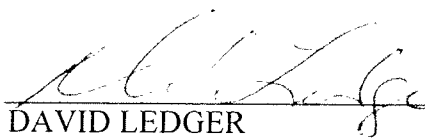
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24 Response to Interrogatory No. 18: Please refer to the statements of the eye-witnesses,
25 which have been disclosed and produced in discovery and the answer to No. 17 above. Since
26 Plaintiff Moses Fejeran has no valid claim or cause of action, Plaintiff Qianyan Fejeran has no
27 valid. derivative claim or cause of action
28

1 DATED: Hagåtña, Guam, April 5, 2006.

2 CARLSMITH BALL LLP

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4 DAVID LEDGER
5 Attorneys for Defendant
6 Aviation Services (CNMI), Ltd.
7 dba Freedom Air
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DECLARATION OF JOAQUIN FLORES


GUAM, U.S.A.

I, Joaquin Flores, am GENERAL MANAGER of AVIATION SERVICES (CNMI), LTD. dba FREEDOM AIR and am authorized to make this Declaration.

I have read the foregoing answers and objections to PLAINTIFF'S FIRST REQUEST FOR ANSWERS TO INTERROGATORIES and, to the best of my knowledge, the information stated therein is true and correct. The information necessary to prepare said responses was obtained from records maintained by Aviation Services (CNMI), Ltd. dba Freedom Air and elsewhere.

I declare under penalty of perjury of the laws of the United States that the foregoing is true and correct.

DATED: April 3, 2006.


JOAQUIN FLORES

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 5th day of April 2006, I will cause to be served, via hand delivery, a true and correct copy of DEFENDANT'S RESPONSE TO PLAINTIFFS FIRST SET OF INTERROGATORIES; VERIFICATION to the following Counsel of record.

David G. Banes, Esq.
O'Connor Berman Dotts & Banes
Second Floor, Nauru Building
Post Office Box 501969
Saipan, MP 96950

DATED: April 5, 2006.

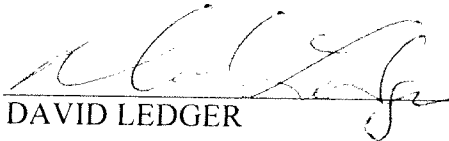

DAVID LEDGER

EXHIBIT B

CARLSMITH BALL LLP

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Carlsmith Ball LLP Building
Capitol Hill
Post Office Box 5241
Saipan, MO 96950-5241
Tel No. 670.322.3455

Attorneys for Defendant
Aviation Services (CNMI), Ltd. dba Freedom Air

UNITED STATES DISTRICT COURT
FOR THE
NORTHERN MARIANA ISLANDS

MOSES T. FEJERAN and
QIANYAN S. FEJERAN,

Plaintiffs,

vs.

AVIATION SERVICES (CNMI), LTD.
dba FREEDOM AIR,

Defendant.

CIVIL ACTION NO. 05-0033

**DEFENDANT'S THIRD
SUPPLEMENTAL RULE 26
DISCLOSURES; CERTIFICATE
OF SERVICE**

Defendant Aviation Services (CNMI), Ltd. dba Freedom Air, by and through their Attorney of record, David Ledger, submit the following Third Supplemental Rule 26 Disclosure statement pursuant to Fed. R. Civ. P. 26(a)(1) and LR 16.2CJ(d):

[....]

II. Listing, Description and Location of Documents, Data Compilations and Tangible Things

Freedom Air Continuous Airworthiness Maintenance Program.

[....]

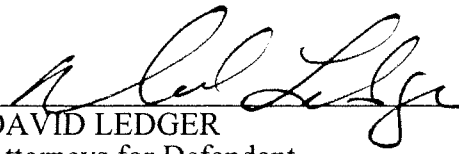
Law Offices
O'Connor Barron Datta & Jones

RECEIVED

By: Jhen Bautista
Date: 4/16/07
Time: 4:28 pm

1 DATED: Hagåtña, Guam, April 16, 2007.

2 CARLSMITH BALL LLP

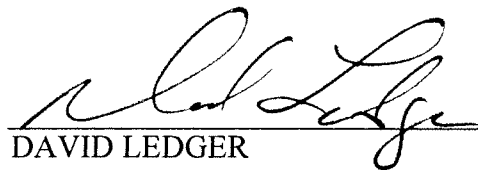
3 
4 DAVID LEDGER
5 Attorneys for Defendant
6 Aviation Services (CNMI), Ltd.
7 dba Freedom Air
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 16th day of April 2007, I will cause to be served, via hand delivery, a true and correct copy of **DEFENDANT'S THIRD SUPPLEMENTAL INITIAL DISCLOSURES** to the following Counsel of record.

David G. Banes, Esq.
George Hasselback, Esq.
O'Connor Berman Dotts & Banes
Second Floor, Nauru Building
Post Office Box 501969
Saipan, MP 96950

DATED: Hagåtña, Guam, April 16, 2007.


DAVID LEDGER

FREEDOM AIR

CONTINUOUS AIRWORTHINESS MAINTENANCE PROGRAM

SHORTS SD3-60

“ A “ INSPECTION (EVERY 60 HOURS / 1 MONTH)

THE INSPECTION REQUIREMENTS CONTAINED IN THIS INSPECTION WORK PACKAGE ARE EXTRACTED FROM THE SHORT BROTHERS SD3-60 MAINTENANCE PROGRAM (REF. # 360/MP) THROUGH REVISION 10, DATED APRIL 24, 2003.

NOTE: SELECTED SINGLE MAINTENANCE PROGRAM TASKS THAT INVOLVE MULTIPLE WORK AREAS OR HAVE MULTIPLE INSPECTION REQUIREMENTS HAVE BEEN DIVIDED INTO SEPARATE SIGN-OFF ITEMS TO EASE CONTROL OF THE INSPECTION.

NOTE: SELECTED ITEMS THAT ARE NORMALLY CONTROLLED SEPARATELY ON KARDEX OR COMPUTER (I.E. OVERHAULS, REPLACEABLE COMPONENT FUNCTIONAL CHECKS, ETC.) HAVE BEEN OMITTED FROM THIS INSPECTION WORK PACKAGE, AND MUST BE CONTROLLED SEPARATELY.

NOTE: THIS INSPECTION PACKAGE MUST BE UPDATED AS NEW REVISIONS TO THE MAINTENANCE PROGRAM ARE ISSUED.

SD 3-60

“A” INSPECTION

“A” INSPECTION HAS BEEN ACCOMPLISHED ON AIRCRAFT:

N _____ AT TAT _____ & TAC _____ DATE _____

I certify this aircraft has been inspected in accordance with Freedom Air FAA approved Continuous Airworthiness Maintenance Program and was determined to be in airworthy condition and is approved for return to service.

Signature Type of Certificate & No.: _____

FREEDOM AIR**CONTINUOUS AIRWORTHINESS MAINTENANCE PROGRAM****SD3 -60****“A” INSPECTION**

TASK#: 21-50-03 ZN: 120 INTERVAL: A REF: AAR SYSTEM MANUAL

TASK: **FREON AIR CONDITIONING**

CHECK READING ON SYSTEM HOUR METER AND RECORD METER HOURS:

FWD: _____ AFT: _____

ACCESS: (122AZ)

MECH

INSP

TASK#: 25-60-01(A) ZN: 200 INTERVAL: A REF:

TASK: **EMERGENCY EQUIPMENT (EMERGENCY AX)**

INSPECT EMERGENCY AX

MECH

INSP

ACCESS:

TASK#: 30-40-06 ZN: 220 INTERVAL: A REF:

TASK: **RAIN REPELLENT RESERVOIR**

VISUAL CHECK RESERVOIR FOR FLUID LEVEL.

MECH

INSP

ACCESS:

TASK#: Z12 ZN: 220 INTERVAL: A REF:

TASK: **FLIGHT COMPARTMENT**

INSPECT COMPARTMENT FOR CLEANLINESS AND GENERAL CONDITION. EMERGENCY EQUIPMENT FITTED AND SECURE.

MECH

INSP

ACCESS:

TASK#: Z27 ZN: 260 INTERVAL: A REF:

TASK: **PASSENGER COMPARTMENT**

INSPECT COMPARTMENT, LOCKERS, FURNISHINGS, GALLEY AND TOILET AREAS FOR CLEANLINESS, GENERAL CONDITION & SECURITY. RETAINING LATCHES FOR OPERATION; COMPARTMENT LIGHTING & WINDOWS, EMERGENCY EQUIPMENT FITTED & SECURE.

MECH

INSP

ACCESS:

TASK#: Z66(A) ZN: 810 INTERVAL: A REF:

TASK: **FORWARD BAGGAGE DOOR**

INSPECT DOOR INCLUDING SEALS, HINGES, LOCK MECHANISM & DOOR COAMING FOR GENERAL CONDITION, DETERIORATION, DAMAGE AND SECURITY.

MECH

INSP

ACCESS:

TASK#: Z66(B) ZN: 810 INTERVAL: A REF:

TASK: **FORWARD BAGGAGE DOOR**

MANUALLY OPERATE LOCK MECHANISM TO DETERMINE CONDITION OF LINKAGE AND LATCHING

MECH

INSP

ACCESS:

FREEDOM AIR**CONTINUOUS AIRWORTHINESS MAINTENANCE PROGRAM****SD3 -60
"A" INSPECTION**

TASK#: Z09(A) ZN: 200 INTERVAL: A REF:

TASK: **FUSELAGE UPPER STN.-80 TO 508 – EXTERN. (ABOVE FLOOR LEVEL)**
INSPECT VISIBLE PORTION OF FUSELAGE SKIN FOR GENERAL CONDITON, DAMAGE,
SECURITY OF FASTENERS, ETC. SECURITY OF ACCESS PANELS SIGNS, OF FLUID
LEAKAGE, WINDSHIELDS AND WINDOW AS VISIBLE FROM GROUND.

MECH

INSP

ACCESS:

TASK#: Z09(B) ZN: 200 INTERVAL: A REF:

TASK: **FUSELAGE UPPER STN.-80 TO 508 – EXTERNAL (ABOVE FLOOR LEVEL)**
AVIONICS ANTENNAS, PITOT
HEADS AND STATIC VENTS SIGNS OF FLUID LEAKAGE.

MECH

INSP

ACCESS:

TASK#: 28-00-01 ZN: 200 INTERVAL: A REF:

TASK: **FUEL DISTRIBUTION SYSTEM**
VISUAL CHECK EXTERIOR OF AIRCRAFT FOR OBVIOUS LEAKS. CHECK FRANGIBLE
SAFETY WIRE ON L.P. LEVERS IS INTACT IN ACCORDANCE WITH SERVICE BULLETIN
SD360-28-20

MECH

INSP

ACCESS:

TASK#: Z18(D) ZN: 230 INTERVAL: A REF:

TASK: **FUEL DISTRIBUTION SYSTEM**
CHECK PAN DRAINS

MECH

INSP

ACCESS:

TASK#: Z01 ZN: 100 INTERVAL: A REF:

TASK: **FUSELAGE LOWER – EXTERNAL (BELOW FLOOR LEVEL)**
INSPECT FUSELAGE SKIN FOR GENERAL CONDITION, DAMAGE, AND SECURITY OF
PANELS. AVIONICS – GENERAL CONDITION OF ANTENNAS, VISUAL SIGNS OF FLUID
LEAKAGE.

MECH

INSP

ACCESS:

TASK#: Z65 ZN: 800 INTERVAL: A REF:

TASK: **DOORS - EXTERNAL**
INSPECT EXTERIOR OF DOORS AND EXITS FOR GENERAL CONDITION AND DAMAGE.

MECH

INSP

ACCESS:

TASK#: Z33(A) ZN: 300 INTERVAL: A REF:

TASK: **EMPENNAGE STN. 508 TO 741 – SIDE & LOWER PORTION – EXTER.**
INSPECT AFT PORTION OF FUSELAGE, FLIGHT CONTROL SURFACE SKINS, HINGES &
ATTACHMENT FITTINGS, VORTEX GENERATORS FOR GENERAL CONDITION & DAMAGE;
AND SECURITY OF ACCESS PANELS, AS VISIBLE FROM GROUND.

MECH

INSP

ACCESS:

FREEDOM AIR**CONTINUOUS AIRWORTHINESS MAINTENANCE PROGRAM****SD3 -60
"A" INSPECTION**

TASK#: Z58(B) ZN: 710 INTERVAL: A REF:

TASK: NOSE GEAR DOORS AND OPERATING MECHANISM

INSPECT SEALS, BEARINGS & RODS WITH DOORS OPEN.

MECH

INSP

ACCESS:

TASK#: Z61(A1) ZN: 700 INTERVAL: A REF:

TASK: MAIN LANDING GEAR (LEFT)

INSPECT FOR GENERAL CONDITION, DAMAGE & HYDRAULIC LEAKAGE WITH MLG WHEEL PANELS INSTALLED QUICK ACCESS PANEL OPEN.

MECH

INSP

ACCESS:

TASK#: Z62(A) ZN: 730 INTERVAL: A REF:

TASK: LEFT STUB WING - EXTERNAL

INSPECT ZONE INCLUDING MAIN LANDING GEAR FAIRINGS FOR GENERAL CONDITION, DAMAGE AND SECURITY OF ACCESS PANELS & EVIDENCE OF FLUID LEAKAGE.

MECH

INSP

ACCESS:

TASK#: Z62(B) ZN: 730 INTERVAL: A REF:

TASK: LEFT STUB WING - EXTERNAL

CHECK TIRE AND WHEEL CONDITION, TIRE PRESSURE, AND BRAKE ASSEMBLY - PAD WEAR INDICATOR.

MECH

INSP

ACCESS:

TASK#: Z59 ZN: 720 INTERVAL: A REF:

TASK: RIGHT STUB WING - EXTERNAL

INSPECT ZONE INCLUDING MAIN LANDING GEAR FAIRINGS FOR GENERAL CONDITION, DAMAGE AND SECURITY OF ACCESS PANELS.

MECH

INSP

SEE TASK Z59(B)

ACCESS: 720LT

TASK#: Z59(B) ZN: 720 INTERVAL: A REF:

TASK: RIGHT STUB WING - EXTERNAL

INSPECT ZONE INCLUDING - TIRE AND WHEEL CONDITION, TIRE PRESSURE, BRAKE ASSEMBLY - PAD WEAR INDICATOR, EVIDENCE OF FLUID LEAKAGE

MECH

INSP

(SEE TASK Z59(A))

ACCESS: 720LT

TASK#: Z61(A2) ZN: 700 INTERVAL: A REF:

TASK: MAIN LANDING GEAR (RIGHT)

INSPECT FOR GENERAL CONDITION, DAMAGE & HYDRAULIC LEAKAGE WITH MLG WHEEL PANELS INSTALLED, QUICK ACCESS PANEL OPEN.

MECH

INSP

ACCESS:

FREEDOM AIR**CONTINUOUS AIRWORTHINESS MAINTENANCE PROGRAM****SD3 -60
"A" INSPECTION**

TASK#: 79-00-02(A) ZN: 400 INTERVAL: A REF:

TASK: WING TRAILING EDGE SHROUDS (LEFT)

CHECK FOR DETERIORATION OF SPEED TAPE AND REPLACE AS NECESSARY

MECH

INSP

ACCESS:

TASK#: 79-00-02(A) ZN: 400 INTERVAL: A REF:

TASK: OIL SYSTEM (LEFT ENGINE)

SERVICE OIL AS NEEDED.

MECH

INSP

ACCESS:

TASK#: Z49(A) ZN: 500 INTERVAL: A REF:

TASK: OUTER & CENTER WINGS – EXTERNAL (LEFT)

INSPECT, AS VISIBLE FROM GROUND, WINGS, STRUTS, FLIGHT SURFACES, HINGES & ATTACHMENT FITTINGS FOR GENERAL CONDITION, DAMAGE & SECURITY. LANDING LIGHT & FAIRINGS.

MECH

INSP

ACCESS:

TASK#: 27-00-15(B) ZN: 600 INTERVAL: A REF:

TASK: WING TRAILING EDGE (RIGHT)

CHECK FOR DETERIORATION OF SPEED TAPE AND REPLACE AS NECESSARY

MECH

INSP

ACCESS:

TASK#: 79-00-02(B) ZN: 400 INTERVAL: A REF:

TASK: OIL SYSTEM (RIGHT ENGINE)

SERVICE OIL AS NEEDED.

MECH

INSP

ACCESS:

TASK#: Z49(B) ZN: 600 INTERVAL: A REF:

TASK: OUTER & CENTER WINGS – EXTERNAL (RIGHT)

INSPECT, AS VISIBLE FROM GROUND, WINGS, STRUTS, FLIGHT SURFACE, HINGES & ATTACHMENT FITTINGS FOR GENERAL CONDITION, DAMAGE & SECURITY. LANDING LIGHT & FAIRINGS.

MECH

INSP

ACCESS:

TASK#: Z42(A) ZN: 400 INTERVAL: A REF:

TASK: POWER PLANT – EXTERNAL (LEFT ENGINE)

INSPECT ENGINE COWLINGS AND LATCHES, INLETS & EXHAUST STUBS FOR GENERAL CONDITION, DAMAGE & SECURITY & SIGNS OF FLUID LEAKAGE WITH COWLING CLOSED.

MECH

INSP

ACCESS:

FREEDOM AIR**CONTINUOUS AIRWORTHINESS MAINTENANCE PROGRAM****SD3 -60
"A" INSPECTION**

TASK#: Z45(A1) ZN: 400 INTERVAL: A REF:

TASK: <u>PROPELLER - EXTERNAL (LEFT)</u> INSPECT FOR GENERAL CONDITION & DAMAGE OF BLADES. DE-ICING BOOTS FOR GENERAL CONDITION & ABRASION ETC. & EVIDENCE OF OIL LEAKAGE. INSPECT FOR EROSION DAMAGE. ACCESS:	MECH _____	INSP _____
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TASK#: Z48(A1) ZN: 440 INTERVAL: A REF:

TASK: <u>NACELLE - EXTERNAL (LEFT ENGINE)</u> INSPECT, AS VISIBLE FROM GROUND, SKIN FOR GENERAL CONDITION, DAMAGE AND SECURITY OF ACCESS PANELS. ACCESS:	MECH _____	INSP _____
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TASK#: Z42(B) ZN: 400 INTERVAL: A REF:

TASK: <u>POWER PLANT - EXTERNAL (RIGHT ENGINE)</u> INSPECT ENGINE COWLINGS AND LATCHES, INLETS & EXHAUST STUBS FOR GENERAL CONDITION, DAMAGE & SECURITY, SIGNS OF FLUID LEAKAGE WITH COWLING CLOSED. ACCESS:	MECH _____	INSP _____
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TASK#: Z45(A2) ZN: 400 INTERVAL: A REF:

TASK: <u>PROPELLER - EXTERNAL (RIGHT)</u> INSPECT FOR GENERAL CONDITION & DAMAGE OF BLADES. DE-ICING BOOTS FOR GENERAL CONDITION & ABRASION ETC. & EVIDENCE OF OIL LEAKAGE. INSPECT FOR EROSION DAMAGE. ACCESS:	MECH _____	INSP _____
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TASK#: Z48(A2) ZN: 440 INTERVAL: A REF:

TASK: <u>NACELLE - EXTERNAL (RIGHT ENGINE)</u> INSPECT, AS VISIBLE FROM GROUND, SKIN FOR GENERAL CONDITION, DAMAGE AND SECURITY OF ACCESS PANELS. ACCESS:	MECH _____	INSP _____
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TASK#: ZZ-PANELS ZN: (ALL) INTERVAL: A REF:

TASK: <u>ACCESS PANELS</u> INSPECT ALL ACCESS PANELS REMOVED FOR THIS INSPECTION FOR INSTALLATION/SECURITY. ACCESS:	MECH _____	INSP _____
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FREEDOM AIR

CONTINUOUS AIRWORTHINESS MAINTENANCE PROGRAM

SHORTS SD3-60

“ C “ INSPECTION (EVERY 1,200 HOURS / 12 MONTHS)

THE INSPECTION REQUIREMENTS CONTAINED IN THIS INSPECTION WORK PACKAGE ARE EXTRACTED FROM THE SHORT BROTHERS SD3-60 MAINTENANCE PROGRAM (REF. # 360/MP) THROUGH REVISION 10, DATED APRIL 24, 2003.

NOTE: SELECTED SINGLE MAINTENANCE PROGRAM TASKS THAT INVOLVE MULTIPLE WORK AREAS OR HAVE MULTIPLE INSPECTION REQUIREMENTS HAVE BEEN DIVIDED INTO SEPARATE SIGN-OFF ITEMS TO EASE CONTROL OF THE INSPECTION.

NOTE: SELECTED ITEMS THAT ARE NORMALLY CONTROLLED SEPARATELY ON KARDEX OR COMPUTER (I.E. OVERHAULS, REPLACEABLE COMPONENT FUNCTIONAL CHECKS, ETC.) HAVE BEEN OMITTED FROM THIS INSPECTION WORK PACKAGE, AND MUST BE CONTROLLED SEPARATELY.

NOTE: THIS INSPECTION PACKAGE MUST BE UPDATED AS NEW REVISIONS TO THE MAINTENANCE PROGRAM ARE ISSUED.

SD 3-60
“C” INSPECTION

“C” INSPECTION HAS BEEN ACCOMPLISHED ON AIRCRAFT:

N _____ AT TAT _____ & TAC _____ DATE _____

I certify this aircraft has been inspected in accordance with Freedom Air FAA approved Continuous Airworthiness Maintenance Program and was determined to be in airworthy condition and is approved for return to service.

Signature Type of Certificate & No.: _____

FREEDOM AIR**CONTINUOUS AIRWORTHINESS MAINTENANCE PROGRAM****SD3 -60****"C" INSPECTION**

TASK#: 32-40-02 ZN: 200 INTERVAL: C REF:

TASK: MASTER BRAKE CYLINDER - 4 EACHVISUAL CHECK MASTER BRAKE CYLINDER FOR LEAKAGE AND FLUID CONTENTS.
(SERVICE AS REQUIRED)
P/N ACM 28546

MECH

INSP

ACCESS:

TASK#: Z03 ZN: 122 INTERVAL: C REF:

TASK: (RIGHT) EQUIPMENT BAY - INTERNALINSPECT BAY FOR GENERAL CONDITION OF STRUCTURE, ELECTRICAL WIRING &
CONNECTIONS. COMPONENTS - GENERAL CONDITION AND SECURITY.

MECH

INSP

ACCESS: 122AZ

TASK#: Z04(A) ZN: 121 INTERVAL: C REF:

TASK: LEFT (SIDE) EQUIPMENT BAYS STN. 3-54 - INTERNALINSPECT BAY FOR GENERAL CONDITION OF STRUCTURE INCLUDING ACCESS PANEL
HINGES AND FASTENERS. HYDRAULIC COMPONENTS AND PLUMBING.

MECH

INSP

ACCESS: 121AL, BL (SEE TASKS Z04(B), (C) & (D))

TASK#: Z04(B) ZN: 121 INTERVAL: C REF:

TASK: LEFT (SIDE) EQUIPMENT BAYS STN. 3-54 - INTERNALINSPECT NOSE STEERING CABLES AND PULLEYS, RUDDER PEDAL TORQUE TUBES AND
STOPS.

MECH

INSP

ACCESS: 121AL, BL (SEE TASKS Z04(A), (C) & (D))

TASK#: Z04(C) ZN: 121 INTERVAL: C REF:

TASK: LEFT (SIDE) EQUIPMENT BAYS STN. 3-54 - INTERNALINSPECT AVIONICS & NAVIGATION EQUIPMENT, INCLUDING SHOCK MOUNTS.
ELECTRICAL CABLE LOOMS & TERMINAL BLOCKS, PITOTS/STATIC PLUMBING & DRAIN
VALVES.

MECH

INSP

ACCESS: 121AL, BL (SEE TASKS Z04(A), (B) & (C))

TASK#: Z04(D) ZN: 121 INTERVAL: C REF:

TASK: LEFT (SIDE) EQUIPMENT BAYS STN. 3-54 - INTERNALINSPECT PANEL IC DIODE BOARD. VISUALLY CHECK FOR SIGNS OF OVERHEATING OR
LOOSE TERMINALS.

MECH

INSP

ACCESS: 121AL, BL (SEE TASKS Z04(A), (B) & (C))

TASK#: Z13 ZN: 220 INTERVAL: C REF:

TASK: FLIGHT COMPARTMENT - INTERNALINSPECT AREA FOR GENERAL CONDITION OF STRUCTURE, NOSE WHEEL STEERING
LEVER, SPROCKET, CHAINS AND CABLES, PARKING BRAKE, HYDRAULIC PLUMBING.
ELECTRONICS, ETC.

MECH

INSP

ACCESS: 220BZ

FREEDOM AIR**CONTINUOUS AIRWORTHINESS MAINTENANCE PROGRAM****SD3 -60
"C" INSPECTION**

TASK#: 11-00 ZN: ALL INTERVAL: C REF: AFM & IPC

TASK: EXTERNAL & INTERNAL PLACARDS AND MARKINGS

VISUALLY CHECK EXTERNAL & INTERNAL PLACARDS AND MARKINGS CHECK TO ENSURE LEGIBILITY, COMPLEMENT & LOCATION PARTICULAR ATTENTION SHOULD BE GIVEN TO EMERGENCY MARKINGS

ACCESS: VARIOUS

MECH

INSP

TASK#: 23-30-07 ZN: 220 INTERVAL: C REF: M.M 23-31-10, pg 201

TASK: COMMUNICATION PRIORITY SWITCHING FOR PASSENGER ADDRESS

OPERATIONAL CHECK PRIORITY SWITCHING FOR PASSENGER ADDRESS SYSTEM.

ACCESS:

MECH

INSP

TASK#: 24-30-03 ZN: 121 INTERVAL: C REF: M.M 24-31-00, pg 501

TASK: ELECTRICAL POWER CONTROL AND PROTECTION UNIT (CPU)

TEST IN SITU BUSBAR VOLTAGE FUNCTION OF (CPU); 2 EACH

ACCESS: 121AZ, 122AZ

MECH

INSP

TASK#: 26-10-01 ZN: 210 INTERVAL: C REF: M.M 26-13-00, pg 201

TASK: FIRE DETECTION SMOKE DETECTOR (FWD)

CLEAN SMOKE DETECTORS (2 EACH) IN FWD BAGGAGE COMPARTMENT.

ACCESS:

MECH

INSP

TASK#: 26-10-01(B) ZN: 312 INTERVAL: C REF: M.M 26-13-00, pg 201

TASK: FIRE DETECTION SMOKE DETECTOR (AFT)

CLEAN SMOKE DETECTORS (2 EACH) IN AFT BAGGAGE COMPARTMENT.

ACCESS:

MECH

INSP

TASK#: 26-10-06 ZN: 260 INTERVAL: C REF: M.M 26-13-00, pg 201

TASK: SMOKE DETECTOR (LAVATORY)

CLEAN SMOKE DETECTOR IN TOILET COMPARTMENT.

ACCESS:

MECH

INSP

TASK#: 27-00-05 ZN: 500.600 INTERVAL: C REF: M.M 27-33-00, pg 201

TASK: STALL WARNING SYSTEM

FUNCTIONAL CHECK STALL WARNING SYSTEM 2 EACH

ACCESS:

MECH

INSP

FREEDOM AIR**CONTINUOUS AIRWORTHINESS MAINTENANCE PROGRAM****SD3 -60
"C" INSPECTION**

TASK#: 27-30-03A ZN: 220 INTERVAL: C REF: M.M 27-33-00, pg 201

TASK: STALL WARNING SYSTEM STICK SHAKERFUNCTIONAL CHECK STICK SHAKER 2 EACH
POST MOD 7583 (ONLY)

MECH

INSP

ACCESS:

TASK#: 27-30-03B ZN: 500 INTERVAL: C REF: M.M 27-33-00, pg 201

TASK: STALL WARNING SYSTEM LIFT DETECTOR (LEFT)FUNCTIONAL CHECK LIFT DETECTOR.
POST MOD 7583 (ONLY)

MECH

INSP

ACCESS:

TASK#: 27-30-03C ZN: 600 INTERVAL: C REF: M.M 27-33-00, pg 201

TASK: STALL WARNING SYSTEM LIFT DETECTOR (RIGHT)

FUNCTIONAL CHECK LIFT DETECTOR.

MECH

INSP

POST MOD 7583 (ONLY)

ACCESS:

TASK#: 27-70-01G ZN: 300 INTERVAL: C REF: M.M 27-70-00, pg 201

TASK: RUDDER GUST LOCKFUNCTIONAL CHECK POST MOD 8112 RUDDER GUST LOCK SYSTEM, INCLUDING
ACTUATOR, SOLENOID, LOCKING ARM, SPRINGPOT, AND SPRING SAFETY.

MECH

INSP

ACCESS: 312TZ

TASK#: 28-40-01 ZN: 100/720 INTERVAL: C REF: M.M 28-42-00 pg 201 & SD360-IL-51

TASK: FUEL GAUGE CONTENTSTEST IN SITU FUEL GAUGE CONTENTS: COMPARE DIPSTICK READINGS WITH GAUGE
INDICATIONS. IF THE READINGS DIFFER CALIBRATE THE SYSTEM IN ACCORDANCE
MAINTENANCE MANUAL.

P/N 710-920

ACCESS: 4P, 720PT

MECH

INSP

TASK#: 30-20-03B/C/D ZN: 220 INTERVAL: C REF: M.M 30-21-00 pg 201

TASK: ENGINE INTAKE ANTI ICING ELECTRICAL (HEAT) CIRCUIT/CONTROL (LT/RT)TEST IN SITU (A) ELECTRICAL CIRCUIT (B) CONTROLLER UNIT P/N AC67222 (C) CURRENT
SENSOR RELAY (INCLUDING CHECKING FOR A HEAT INCREASE OVER ALL HEATED
SURFACES OF INTAKES)

NOTE: CURRENT SENSOR ACR739AG-1 PREMOD 7237 & ACR739AG-2 POST

ACCESS: VARIOUS 7 PANEL 4C

MECH

INSP

TASK#: 33-50-01 ZN: 260 INTERVAL: C REF:

TASK: PASSENGER SERVICE UNIT (PSU) EMERGENCY LIGHTSOPERATIONAL CHECK PSU LIGHTS, P/N SD3-18-0734/5, 8 EACH.
IN CONJUNCTION WITH TASK 33-00-03

MECH

INSP

ACCESS:

FREEDOM AIR**CONTINUOUS AIRWORTHINESS MAINTENANCE PROGRAM****SD3 -60
"C" INSPECTION**

TASK#: 33-50-02 ZN: 260 INTERVAL: C REF:

TASK: EMERGENCY EXIT SIGNS

OPERATIONAL CHECK EXIT SIGNS; 1 OF EACH P/N SD3-18-6393/-6377 AND 3 EACH SD3-18-6256; IN CONJUNCTION WITH TASK 33-00-03

ACCESS:

MECH

INSP

TASK#: 33-50-03 ZN: 260 INTERVAL: C REF:

TASK: FLOOD LIGHTS (COCKPIT)

OPERATIONAL CHECK ALL FLOOD LIGHTS (IN COCKPIT); 3 EACH; P/N ARL-1 ½.

ACCESS:

MECH

INSP

TASK#: 33-50-03 ZN: 220 INTERVAL: C REF:

TASK: FLOOD LIGHTS (CABIN) TYPE ARL-1/2

OPERATIONAL CHECK CABIN FLOOD LIGHTS (UNDER EXIT DOORS); 4 EA. IN CONJUNCTION WITH TASK 33-00-03

ACCESS:

MECH

INSP

TASK#: 33-50-04 ZN: 260 INTERVAL: C REF:

TASK: EMERGENCY LIGHTS AUTOMATIC SWITCH-ON

OPERATIONAL CHECK AUTOMATIC SWITCH-ON CIRCUIT. IN CONJUNCTION WITH TASK 33-00-03

ACCESS:

MECH

INSP

TASK#: 74-00-01 ZN: 400 INTERVAL: C REF: M.M 74-00-00 pg 201

TASK: IGNITION SYSTEM (LEFT & RIGHT)

OPERATIONAL CHECK IGNITION, AUDIBLE CHECK IGNITORS & TEST ALTERNATE POWER SUPPLY. IN CONJUNCTION WITH TASK 74-10-01A & B

ACCESS: (SEE TASKS 74-10-01A & B)

MECH

INSP

TASK#: 74-10-01A ZN: 200 INTERVAL: C REF: M.M 74-00-00 pg 201

TASK: IGNITION (LEFT & RIGHT)

OPERATIONAL CHECK IGNITION EXCITER P/N 3014365. IN CONJUNCTION WITH TASK 74-00-01

ACCESS:

MECH

INSP

TASK#: 74-10-01B ZN: 200 INTERVAL: C REF: M.M 74-00-00 pg 201

TASK: IGNITION EXCITER ALTERNATE POWER SUPPLY (LEFT & RIGHT)

OPERATIONAL CHECK ALTERNATE POWER SUPPLY. IN CONJUNCTION WITH TASK 74-00-01

ACCESS:

MECH

INSP

FREEDOM AIR**CONTINUOUS AIRWORTHINESS MAINTENANCE PROGRAM****SD3 -60
"C" INSPECTION**

TASK#: 74-20-01(A) ZN: 420 (LT) INTERVAL: C REF: M.M 74-00-00

TASK: IGNITION CABLES (LEFT ENGINE)OPERATIONAL CHECK IGNITION CABLES. IN CONJUNCTION WITH TASK 74-00-01
P/N 3024643

MECH

INSP

ACCESS: 420AT, BB

TASK#: 74-20-01(A) ZN: 420 (RT) INTERVAL: C REF: M.M 74-00-00

TASK: IGNITION CABLE (RIGHT ENGINE)OPERATIONAL CHECK IGNITION CABLES. IN CONJUNCTION WITH TASK 74-00-01
P/N 3024643

MECH

INSP

ACCESS: 420AT, BB

TASK#: 74-20-02(B) ZN: 420 (RT) INTERVAL: C REF: M.M 74-00-00

TASK: IGNITER PLUGS (LEFT ENGINE)

OPERATIONAL CHECK IGNITER PLUGS. (2 EACH) IN CONJUNCTION WITH TASK 74-00-01

MECH

INSP

ACCESS: 420AT, BB (LT)

TASK#: 74-20-02(B) ZN: 420 (RT) INTERVAL: C REF: M.M 74-00-00

TASK: IGNITER PLUGS (RIGHT ENGINE)

OPERATIONAL CHECK IGNITER PLUGS (2 EACH). IN CONJUNCTION WITH TASK 74-00-01

MECH

INSP

ACCESS: 420AT, BB (RT)

TASK#: 21-40-05(A) ZN: 510 INTERVAL: C REF: M.M 21-00-51, pg 201

TASK: AIR CONDITIONING SPAR BOX OVERHEAT THERMISTER. (LEFT)FUNCTIONAL CHECK SPAR BOX OVERHEAT THERMISTER (AT LEFT WING).
P/N SD3-81-0907

MECH

INSP

ACCESS: 510ET

TASK#: 21-40-05(B) ZN: 610 INTERVAL: C REF: M.M 21-00-51, pg 201

TASK: AIR CONDITIONING SPAR BOX OVERHEAT THERMISTER (RIGHT)FUNCTIONAL CHECK SPAR BOX OVERHEAT THERMISTER (AT RIGHT WING).
P/N SD3-81-0907

MECH

INSP

ACCESS: 610ET

TASK#: 25-20-03A ZN: 260 INTERVAL: C REF:

TASK: OVERHEAD LOCKER LATCHES

FUNCTIONAL CHECK LATCHES ON OVERHEAD LOCKERS.

MECH

INSP

ACCESS:

FREEDOM AIR**CONTINUOUS AIRWORTHINESS MAINTENANCE PROGRAM****SD3 -60
"C" INSPECTION**

TASK#: 25-30-01A ZN: 260 INTERVAL: C REF:

TASK: BUFFET/GALLEY

VISUAL CHECK HOT/COLD WATER CONTAINERS

MECH

INSP

ACCESS:

TASK#: 25-30-01B ZN: 260 INTERVAL: C REF:

TASK: BUFFET/GALLEY

FUNCTIONAL CHECK LATCHES ON GALLEY UNIT.

MECH

INSP

ACCESS:

TASK#: Z08 ZN: 130 INTERVAL: C REF:

TASK: TOILET AREA - INTERNAL

INSPECT AREA FOR GENERAL CONDITION OF STRUCTURE & VISIBLE SIGNS OF TOILET LEAKAGE.

MECH

INSP

(USE BOROSCOPE IF ACCESS IS NOT PROVIDED)

ACCESS: 130BB, CB, DB (AFT BELLY PANELS)

TASK#: Z38(A) ZN: 311 INTERVAL: C REF: M.M 27-21-00 & 27-31-00 pg 201

TASK: REAR BAGGAGE COMPARTMENT - INTERNAL

INSPECT AREAS FOR GENERAL CONDITION OF STRUCTURE; ELEVATOR & RUDDER CONTROL LEVERS & RODS - PARTICULARLY IN WAY OF (NEAR ROLLER GUIDES - CHECK ROLLER GUIDE CLEARANCES.

MECH

INSP

ACCESS: 312LZ, MZ, NZ, SZ, TZ, RZ, PZ (SEE TASKS Z38(B) & (C))

TASK#: Z38(B) ZN: INTERVAL: C REF: M.M 27-21-00 & 27-31 pg 201

TASK: REAR BAGGAGE COMPARTMENT - INTERNAL

INSPECT AREA FOR: LAY SHAFT, ELEVATOR & RUDDER TRIM CABLES, PULLEYS, CHAINS & SPROCKETS.

MECH

INSP

ACCESS: 312LZ, MZ, NZ, SZ, TZ, RZ, PZ (SEE TASKS Z38(A) & (C))

TASK#: Z38(C) ZN: 311 INTERVAL: C REF: M.M 27-21-00 & 27-31-00 pg 201

TASK: REAR BAGGAGE COMPARTMENT - INTERNAL

INSPECT AREAS FOR DEICING COMPONENTS AND PLUMBING; ELECTRICAL COMPONENTS AND WIRING TERMINAL BLOCKS, EARTH POINTS.

MECH

INSP

ACCESS: 312LZ, MZ, NZ, SZ, TZ, RZ, PZ (SEE TASKS Z38(A) & (B))

TASK#: 28-00-01 ZN: 200 INTERVAL: C REF:

TASK: FUEL DISTRIBUTION SYSTEM AIRFRAME FILTERS

CHECK FILTERS FOR WATER AND FOREIGN DEBRIS. CLEAN FILTER & HOUSING AS REQUIRED FORWARD AND AFT

MECH

INSP

ACCESS:

FREEDOM AIR**CONTINUOUS AIRWORTHINESS MAINTENANCE PROGRAM****SD3 -60
"C" INSPECTION**

TASK#: Z18(B) ZN: 230 INTERVAL: C REF:

TASK: FUEL DISTRIBUTION SYSTEM

VISUAL CHECK PIPES ABOVE FUSELAGE ROOF

MECH

INSP

ACCESS: 240ER, GR, LR, NL 250DD

TASK#: 28-20-01B ZN: 240 INTERVAL: C REF:

TASK: (FORWARD) FUEL FILTER BOWL

DRAIN WATER FROM (FORWARD) FUEL FILTER.

(IN CONJUNCTION WITH TASK 28-00-01)

MECH

INSP

ACCESS: 240NR

TASK#: 28-20-01B ZN: 250 INTERVAL: C REF:

TASK: (AFT) FUEL FILTER BOWL

DRAIN WATER FROM (AFT) FUEL FILTER.

(IN CONJUNCTION WITH TASK 28-00-01)

MECH

INSP

ACCESS: 250DR

TASK#: 23-60-01 ZN: 310 INTERVAL: C REF:

TASK: STATIC DISCHARGERS (EMPENNAGE)

VISUAL CHECK STATIC DISCHARGERS ON EMPENNAGE (4 EACH) FOR SECURITY AND EVIDENCE OF ELECTRICAL DISCHARGE.

MECH

INSP

ACCESS:

TASK#: 23-60-01 ZN: 560 INTERVAL: C REF:

TASK: STATIC DISCHARGERS (LEFT WING)

VISUAL CHECK OF STATIC DISCHARGERS ON LEFT WING (3 EACH) FOR SECURITY AND EVIDENCE OF ELECTRICAL DISCHARGE.

MECH

INSP

ACCESS:

TASK#: 23-60-01 ZN: 660 INTERVAL: C REF:

TASK: STATIC DISCHARGERS (RIGHT WING)

VISUAL CHECK OF STATIC DISCHARGERS ON RIGHT WING (3 EACH) FOR SECURITY AND EVIDENCE OF ELECTRICAL DISCHARGE.

MECH

INSP

ACCESS:

TASK#: Z20 ZN: 240 INTERVAL: C REF:

TASK: FORWARD FAIRING AREA STN. 74 TO 300.31 - EXTERNAL

INSPECT AREA FOR GENERAL CONDITION AND DAMAGE, SECURITY OF ACCESS PANELS.

MECH

INSP

ACCESS:

FREEDOM AIR**CONTINUOUS AIRWORTHINESS MAINTENANCE PROGRAM****SD3 -60****"C" INSPECTION**

TASK#: Z25 ZN: 250 INTERVAL: C REF:

TASK: **AFT FAIRING STN. 395.75 TO 475. - EXTERNAL**

INSPECT AREA FOR GENERAL CONDITION, DAMAGE & SECURITY OF ACCESS PANELS, AND INTEGRITY OF FUSELAGE ROOF SEALING.

MECH

INSP

ACCESS:

TASK#: 52-00-01 ZN: 810-880 INTERVAL: C REF:

TASK: **DOORS**

FUNCTIONAL CHECK DOORS, LATCH MECHANISM, AND MICROSWITCHES FOR CORRECT OPERATION. A. ENTRANCE B. EMERGENCY (CABIN 3 EACH) C. BAGGAGE (FWD/AFT) D. CARGO. NOTE: AIRCRAFT NOT USING CARGO ROLE ONLY CHECK CARGO DOOR WHEN CARRYING OUT STRUCTURE INSPECTION IN ACCORDANCE WITH SECTION 5-26-52

MECH

INSP

ACCESS:

TASK#: 52-00-03 ZN: 870 INTERVAL: C REF:

TASK: **AIR STAIRS**

FUNCTIONAL CHECK AIR STAIRS FOR CORRECT OPERATION OF MICROSWITCH.

MECH

INSP

ACCESS:

TASK#: 52-00-03 ZN: 870 INTERVAL: C REF:

TASK: **AIR STAIR**

LUBE AIR STAIR LATCH MECHANISM

MECH

INSP

ACCESS:

TASK#: Z58(A) ZN: 840 INTERVAL: C REF:

TASK: **RIGHT FORWARD EMERGENCY DOOR - EXTERNAL**

INSPECT DOOR, INCLUDING SEALS, HINGES AND LOCK MECHANISM FOR GENERAL CONDITION, DETERIORATION, DAMAGE AND SECURITY.

MECH

INSP

ACCESS:

TASK#: Z68(B) ZN: 840 INTERVAL: C REF:

TASK: **RIGHT FORWARD EMERGENCY DOOR - EXTERNAL**

MANUALLY OPERATE LOCK MECHANISM TO DETERMINE CONDION OF LINKAGE AND LATCHING.

MECH

INSP

ACCESS:

TASK#: Z69(A) ZN: 850 INTERVAL: C REF:

TASK: **LEFT FORWARD EMERGENCY DOOR - EXTERNAL**

INSPECT DOOR INCLUDING SEALS, HINGES, LOCK MECHANISM, FOR GENERAL CONDITION, DETERIORATION, DAMAGE, AND SECURITY.

MECH

INSP

ACCESS:

FREEDOM AIR**CONTINUOUS AIRWORTHINESS MAINTENANCE PROGRAM****SD3 -60****"C" INSPECTION**

TASK#: Z69(B) ZN: 850 INTERVAL: C REF:

TASK: **LEFT FORWARD EMERGENCY DOOR - EXTERNAL**

MANUALLY OPERATE LOCK MECHANISM TO DETERMINE CONDITION OF LINKAGE AND LATCHING.

MECH

INSP

ACCESS:

TASK#: Z33(B) ZN: 300 INTERVAL: C REF:

TASK: **EMPENNAGE UPPER - EXTERNAL**

INSPECT SKIN FOR GENERAL CONDITION AND DAMAGE, ANTENNAS.

MECH

INSP

(SEE TASKS Z33(A))

ACCESS:

TASK#: Z35(A) ZN: 311 INTERVAL: C REF:

TASK: **EMPENNAGE - INTERNAL**

INSPECT AREA FOR GENERAL CONDITION OF STRUCTURE, INCLUDING ACCESS PANELS, ELEVATOR AND RUDDER RODS AND LEVERS.

MECH

INSP

ACCESS: 311DL, DR, GL 135AL (SEE TASK Z35(B))

TASK#: Z35(B) ZN: 311 INTERVAL: C REF:

TASK: **EMPENNAGE - INTERNAL**

INSPECT AREA FOR:

ELEVATOR AND RUDDER TRIM CABLES, PULLEYS, CHAINS & SPROCKETS;
ELEVATOR AND RUDDER TORQUE SHAFTS, AND ELEVATOR FLEXIBLE DRIVE.

MECH

INSP

ACCESS: 311DL, DR, GL 351AL (SEE TASK Z35(A))

TASK#: 27-00-14A ZN: 350 INTERVAL: C REF:

TASK: **RUDDER HINGE AND BEARINGS (LUBE)**

LUBRICATE RUDDER HINGE AND BEARINGS.

MECH

INSP

ACCESS: 311DL, 351DL

TASK#: 27-00-14B ZN: 330/340 INTERVAL: C REF:

TASK: **ELEVATOR HINGE AND BEARINGS (LUBE)**

LUBRICATE ELEVATOR HINGE AND BEARINGS.

MECH

INSP

ACCESS: 311DL, 332FT, 342FT

TASK#: Z40(A) ZN: 331-342 INTERVAL: C REF:

TASK: **HORIZONTAL STABILIZERS, ELEVATORS & TRIM TABS. - INT. & EXT**INSPECT SKINS FOR GENERAL CONDITION & DAMAGE INCLUDING ACCESS PANELS;
VORTEX GENERATORS.

MECH

INSP

(SEE TASK Z40(B))

ACCESS: 332AT, BT, CT, ET, FT, GT 342AT, BT, CT, ET, FT, GT

FREEDOM AIR**CONTINUOUS AIRWORTHINESS MAINTENANCE PROGRAM****SD3 -60****"C" INSPECTION**

TASK#: Z40(B) ZN: 331-342 INTERVAL: C REF:

TASK: **HORIZONTAL STABILIZERS, ELEVATORS & TRIM TABS. - INT. & EXT**
INSPECT ELEVATOR AND TRIM TAB ATTACHMENTS; ELEVATOR TRIM TAB CONTROL
RODS & SCREWJACKS; CONDITION OF DEICING BOOTS.

MECH

INSP

(SEE TASK Z40(A))

ACCESS: 332AT, BT, CT, ET, FT, GT 342AT, BT, CT, ET, FT, GT

TASK#: Z50(A) ZN: 500 INTERVAL: C REF:

TASK: **OUTER AND CENTER WINGS - EXTERNAL (LEFT)**
INSPECT UPPER SKINS FOR GENERAL CONDITION, DAMAGE AND SECURITY OF ACCESS
PANELS, CONDITION OF DE-ICING BOOTS.

MECH

INSP

ACCESS:

TASK#: Z50(B) ZN: 600 INTERVAL: C REF:

TASK: **OUTER AND CENTER WINGS - EXTERNAL (RIGHT)**
INSPECT UPPER SKINS FOR GENERAL CONDITION, DAMAGE AND SECURITY OF ACCESS
PANELS, CONDITION OF DE-ICING BOOTS.

MECH

INSP

ACCESS:

TASK#: 32-00-01A/B ZN: 700 INTERVAL: C REF: M.M 32-30-00 pg 201

TASK: **MAIN AND NOSE LANDING GEAR**
FUNCTIONAL CHECK FOR NORMAL FUNCTION AND EMERGENCY LOWERING.

MECH

INSP

ACCESS:

TASK#: 32-30-04 ZN: 700 INTERVAL: C REF: M.M 32-30-00 pg 201

TASK: **LANDING GEAR SHUTTLE VALVES**
FUNCTIONAL CHECK IN CONJUNCTION WITH GEAR RETRACTION TEST.
P/N 104796203; 3 EACH.

MECH

INSP

ACCESS:

TASK#: 32-30-09 ZN: 700 INTERVAL: C REF: M.M 32-30-00 pg 201

TASK: **3-WAY SELECTOR**
FUNCTIONAL CHECK 3-WAY SELECTOR IN CONJUNCTION WITH GEAR RETRACTION TEST.
ENSURE SELECTOR IS RESET (VISUALLY CHECK)
P/N 102697001

MECH

INSP

ACCESS:

TASK#: 32-30-12 ZN: 200 INTERVAL: C REF: M.M 32-30-31 pg 201

TASK: **LANDING GEAR LEVER OPERATING CONTROL SYSTEM**
FUNCTIONAL CHECK L.G. LEVER OPERATING CONTROL SYSTEM; CHECK SAFETY LOCK
AND OVERRIDE.

MECH

INSP

ACCESS:

FREEDOM AIR**CONTINUOUS AIRWORTHINESS MAINTENANCE PROGRAM****SD3 -60****"C" INSPECTION**

TASK#: 32-30-12 ZN: 700 INTERVAL: C REF: M.M 32-11-00 pg 201

TASK: **LANDING GEAR LEVER OPERATING CONTROL SYSTEM**
FUNCTIONAL CHECK FOR FUNCTION OF WEIGHT SWITCHES.

MECH

INSP

ACCESS:

TASK#: 32-40-03 ZN: 700 INTERVAL: C REF: M.M 32-40-00 pg 201

TASK: **PRESSURE REDUCING VALVE WITH CUT-OUT**
FUNCTIONAL CHECK PRESSURE REDUCING VALVE - BY APPLYING BRAKES WITH GEAR
RETRACTED ENSURING BRAKE PRESSURE IS NOT PRESENT.

MECH

INSP

ACCESS:

TASK#: 32-20-01 ZN: 710 INTERVAL: C REF: M.M 12-10-32 pg 301

TASK: **NOSE GEAR**
CHECK NITROGEN PRESSURE (AND SERVICE AS NEEDED)
P/N 200921001 OR 200921003

MECH

INSP

ACCESS:

TASK#: 32-20-01 ZN: 710 INTERVAL: C REF: M.M 32-30-00 pg 201

TASK: **NOSE GEAR UNIT**
TEST IN SITU NOSE GEAR UNIT BEARING CLEARANCE.
P/N 200921001 OR 200921003

MECH

INSP

ACCESS:

TASK#: 32-30-02 ZN: 710 INTERVAL: C REF: M.M 32-30-00 pg 201

TASK: **NLG (ONE WAY) RESTRICTOR**
FUNCTIONAL CHECK RETRACTION TIMES IN CONJUNCTION WITH GEAR RETRACTION
TEST.
P/N FCLX0502150A12

MECH

INSP

ACCESS: 710

TASK#: 32-30-03 ZN: 710 INTERVAL: C REF: M.M 32-20-11 pg 201

TASK: **NLG ASSEMBLY DOWNLOCK ACTUATOR**
FUNCTIONAL CHECK LOCKING MECHANISM.
P/N 104809001

MECH

INSP

ACCESS:

TASK#: 32-30-07 ZN: 700 INTERVAL: C REF: M.M 32-30-00 pg 201

TASK: **NLG RETRACTION ACTUATOR**
TEST IN SITU RETRACTION ACTUATOR FOR BEARING CLEARANCE

MECH

INSP

P.N 104797001 OR 104797002

ACCESS:

FREEDOM AIR**CONTINUOUS AIRWORTHINESS MAINTENANCE PROGRAM****SD3 -60
"C" INSPECTION**

TASK#: Z58(E) ZN: 710 INTERVAL: C REF:

TASK: **NOSE LANDING GEAR - EXTERNAL**
INSPECT SEALS AND PROFILE WITH DOORS CLOSED

MECH

INSP

ACCESS:

TASK#: 32-10-03 ZN: 700 INTERVAL: C REF: M.M 12-10-32 pg 301

TASK: **DRAG BRACE ASSEMBLY, INCLUDING SHOCK, ETC. (LEFT & RIGHT)**
CHECK NITROGEN PRESSURE AND SERVICE SHOCK AS NEEDED.
2 EACH

MECH

INSP

ACCESS:

TASK#: 32-10-03 ZN: 700 INTERVAL: C REF: M.M 32-10-16 pg 201

TASK: **DRAG BRACE ASSEMBLY (LEFT & RIGHT)**
FUNCTIONAL CHECK DOWNLOCKS. (2 EACH)

MECH

INSP

ACCESS:

TASK#: 32-10-06 ZN: 700 INTERVAL: C REF: M.M 32-30-00 pg 201

TASK: **MLG REAR PINTLE PIN SUPPORT BEARINGS (OUTBOARD) (LT & RIGHT)**
TEST IN SITU FOR BEARING CLEARANCE. (2EACH)
P/N 11-4810/P
(IN CONJUNCTION WITH TASK 32-10-04)

MECH

INSP

ACCESS:

TASK#: 32-10-07 ZN: 700 INTERVAL: C REF: M.M 32-30-00

TASK: **MLG REAR PINTLE PIN SUPPORT BEARINGS (INBOARD) (LT & RIGHT)**
TEST IN SITU PINTLE PIN SUPPORT BEARINGS FOR BEARING CLEARANCE
(IN CONJUNCTION WITH TASK 32-10-04)
P/N SD3-11-7310

MECH

INSP

ACCESS:

TASK#: 32-10-08 ZN: 700 INTERVAL: C REF: M.M 32-30-00 pg 201

TASK: **MLG FORWARD PINTLE PIN (LEFT & RIGHT)**
TEST IN SITU FORWARD PINTLE PIN FOR BEARING CLEARANCE
(2 EACH).
P/N 200952001 OR 200952003
(SEE TASKS 32-10-09 & 32-10-10)
ACCESS:

MECH

INSP

TASK#: 32-10-09 ZN: 700 INTERVAL: C REF: M.M 32-30-00

TASK: **MLG FORWARD PINTLE PIN SUPPORT BEARINGS (OUTBOARD) (LT & RIGHT)**
TEST IN SITU FORWARD PINTLE PIN SUPPORT BEARINGS FOR CLEARANCE
(2 EACH).
P/N 11-4875.P
(IN CONJUNCTION WITH MLG OVH)
ACCESS:

MECH

INSP

FREEDOM AIR**CONTINUOUS AIRWORTHINESS MAINTENANCE PROGRAM****SD3 -60****"C" INSPECTION**

TASK#: 32-10-10 ZN: 700 INTERVAL: C REF: M.M 32-30-00

TASK: **MLG FWD PINTLE PIN SUPPORT BEARINGS (INBOARD) (LEFT & RIGHT)**TEST IN SITU FWD PINTLE PIN SUPPORT BEARINGS FOR CLEARANCE
(2 EACH).

P/N SD3-11-7309

(IN CONJUNCTION WITH MLG OVH)

ACCESS:

MECH

INSP

TASK#: 32-30-01 ZN: 720/730 INTERVAL: C REF: M.M 32-30-00 pg 201

TASK: **MLG (ONE WAY) RESTRICTIONS (MAIN GEAR)**FUNCTIONAL CHECK RETRACTION TIMES IN CONJUNCTION WITH GEAR RETRACTION
TEST.

P/N FCLX0500950 AC OR FCLX0502200AA (POST MOD 7700).

ACCESS: 720AT 730AT

MECH

INSP

TASK#: 32-30-06 ZN: 700 INTERVAL: C REF: M.M 32-30-00 pg 201

TASK: **MLG RETRACTION ACTUATOR (LEFT & RIGHT)**TEST IN SITU RETRACTION ACTUATOR FOR BEARING CLEARANCE
(2 EACH).

P/N 1047'96002 OR 104796004

ACCESS:

MECH

INSP

TASK#: 32-10-01 ZN: 700 INTERVAL: C REF: M.M 32-30-00 pg 201

TASK: **WHEEL LEVER UNIT (LEFT)**

TEST IN SITU WHEEL LEVER UNIT FOR BEARING CLEARANCE.

P/N 2009 16001

ACCESS:

MECH

INSP

TASK#: 32-10-04 ZN: 700 INTERVAL: C REF: M.M 32-30-00 pg 201

TASK: **REAR PINTLE AND LEVER (LEFT)**

TEST IN SITU REAR PINTLE AND LEVER FOR BEARING CLEARANCE.

P/N 200950001.

(SEE TASKS 32-10-06 AND 32-10-07)

ACCESS:

MECH

INSP

TASK#: 32-10-02 ZN: 700 INTERVAL: C REF: M.M 32-30-00 pg 201

TASK: **WHEEL LEVER UNIT (RIGHT)**

TEST IN SITU WHEEL LEVER UNIT FOR BEARING CLEARANCE.

P/N 2009 17001

ACCESS:

MECH

INSP

TASK#: 32-10-05 ZN: 700 INTERVAL: C REF: M.M 32-30-00 pg 201

TASK: **REAR PINTLE AND LEVER (RIGHT)**

TEST IN SITU REAR PINTLE AND LEVER FOR BEARING CLEARANCE.

P/N 200951001

(SEE TASKS 32-10-06 AND 32-10-07)

ACCESS:

MECH

INSP

FREEDOM AIR**CONTINUOUS AIRWORTHINESS MAINTENANCE PROGRAM****SD3 -60
"C" INSPECTION**

TASK#: 25-99-02 ZN: 130 INTERVAL: C REF: STC ST290CH Cargo Restraint Docu.

TASK: CABIN CARGO NETS (CARGO/STC ST290CH AIRCRAFT ONLY)

(INSPECT CARGO NETS, STRAPS, AND FITTINGS AFTER FULLY EXTENDING, FOR FRAYING, TEARING, BROKEN STICHES, CONDITION AND LEGIBILITY OF CARGO NET ID TAGS, EVERY 1,200 HOURS OR 12 MONTHS, WHICHEVER COMES FIRST)

MECH

INSP

ACCESS:

TASK#: 73-10-04

ZN: 420

INTERVAL: C

REF: SEE NOTE

TASK: OIL TO FUEL HEATERS (LEFT & RIGHT)TEST IN SITU. NOTE: REFER TO EQUIPMENT MAINT. MANUAL 71-00-00 PARA 8.A (5) P522 (P518 ON -65 & P516 ON -67)
P/N 3032707

MECH

INSP

ACCESS: 420BB (LT & RT)

TASK#: 29-00-01A

ZN: 730

INTERVAL: B

REF: M.M 12-10-29 pg 301

TASK: HYDRAULIC SYSTEM RESERVOIR

SERVICE CHECK RESERVOIR GAS PRESSURE AND REPLENISH FLUID AS NECESSARY.

MECH

INSP

(SEE TASK 29-10-01)

ACCESS:

TASK#: ZZ-PANELS

ZN: (ALL)

INTERVAL: C

REF:

TASK: ACCESS PANELS

INSPECT ALL ACCESS PANELS REMOVED FOR THIS INSPECTION FOR INSTALLATION/SECURITY

MECH

INSP

ACCESS:

EXHIBIT C

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Aviation Services (CNMI), Ltd. dba Freedom Air

UNITED STATES DISTRICT COURT
FOR THE
NORTHERN MARIANA ISLANDS

MOSES T. FEJERAN and
QIANYAN S. FEJERAN,

Plaintiffs,

vs.

AVIATION SERVICES (CNMI), LTD.
dba FREEDOM AIR,

Defendant.

CIVIL ACTION NO. 05-0033

**DEFENDANT'S SECOND
SUPPLEMENTAL RESPONSES TO
PLAINTIFF QIANYAN S. FEJERAN'S
FIRST SET OF DISCOVERY
REQUESTS - INTERROGATORIES;
DECLARATION OF SERVICE**

Defendant Aviation Services (CNMI), Ltd. dba Freedom Air hereby supplements its responses to Plaintiff's Interrogatories as follows:

Interrogatory No. 1: Please DESCRIBE IN DETAIL each and every modification, alternation, repair, renovation, upkeep, maintenance, whether done in the normal course of Defendant's business or otherwise, made to or performed upon the STAIRWAY including but not limited to, inspection and tightening and/or loosening of any bolts, screws, nuts or other fasteners or components of the STAIRWAY, for a period of time *one year prior* to the date of the OCCURRENCE. In so describing:

Law Offices
O'Connor Bennett Dotts & Bones

RECEIVED

By: Jhen Bautista
Date: 4/16/07
Time: 4:28 pm

4829-6070-2721.1 059303-00001

FILE

1 a. IDENTIFY the PERSON(S) who performed or directed some other PERSON
2 perform the modification, alternation, repair, renovation, upkeep, and/or maintenance;

3 b. Explain what event(s) prompted the particular acts of modification, alternation,
4 repair, renovation, upkeep and/or maintenance, etc.;

5 c. And, IDENTIFY each and every DOCUMENT reflecting the performance of the
6 particular acts of modification, alteration, repair, renovation, upkeep and/or maintenance, or that
7 were generated pursuant to those particular acts.

8 **Response to Interrogatory No. 1:** Primarily, the steps and handrails are checked by
9 maintenance personnel daily on each departure out of Guam on the morning and afternoon
10 flights or any other flight and when the aircraft is brought to the hangar for routine maintenance.
11 Security and function are also checked before the first flight of the day by flight crewmembers
12 during preflight checks. The flight attendant also checks for function and security during
13 departure of the first flight of the day and during deployment and retraction at every stop
14 following that flight. Detailed inspections are performed as per the Short Brothers SD3-60
15 maintenance program. Based on these various inspections and a finding of good condition and
16 proper operation within allowable tolerances, no maintenance other than routine maintenance
17 such as cleaning and lubrication, or modifications have been required during this time period.

18
19 **Interrogatory No. 2:** Please DESCRIBE IN DETAIL each and every modification,
20 alternation, repair, renovation, upkeep, maintenance, whether done in the normal course of
21 Defendant's business or otherwise, made to or performed upon the STAIRWAY including but
22 not limited to, inspection and tightening and/or loosening of any bolts, screws, nuts or other
23 fasteners or components of the STAIRWAY, *between the date of the OCCURRENCE and the*
24 *date of the inspection of the STAIRWAY by Plaintiff's expert Frank Perez.* In so describing:

25 a. IDENTIFY the PERSON(S) who performed or who directed that some other
26 PERSON perform the modification, alternation, repair, renovation, upkeep and/or maintenance,

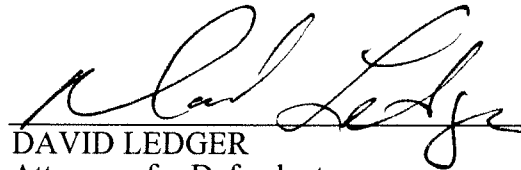
27 b. Explain what event(s) prompted the particular acts of modification, alteration,
28 repair, renovation, upkeep and/or maintenance,

1 c. And, IDENTIFY ANY AND ALL DOCUMENTS reflecting the performance of
2 the particular acts of modification, alteration, repair, renovation, upkeep and/or maintenance, or
3 that were generated pursuant to those particular acts.

4 **Response to Interrogatory No. 2:** Primarily, the steps are checked by maintenance
5 personnel daily on each departure out of Guam on the morning and afternoon flights or any other
6 flight and when the aircraft is brought to the hangar for routine maintenance. Security and
7 function are also checked before the first flight of the day by flight crewmembers during
8 preflight checks. The flight attendant also checks for function and security during departure of
9 the first flight of the day and during deployment and retraction at every stop following that flight.
10 Detailed inspections are performed as per the Short Brothers SD3-60 maintenance program.
11 Based on these various inspections and a finding of good condition and proper operation within
12 allowable tolerances, no maintenance other than routine maintenance such as cleaning, and
13 lubrication or modifications have been required during this time period.

14
15 DATED: April 16, 2007.

16 CARLSMITH BALL LLP


17 
18 DAVID LEDGER
19 Attorneys for Defendant
20 Aviation Services (CNMI), Ltd.
21 dba Freedom Air
22
23
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25
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27
28

DECLARATION OF SERVICE

The undersigned hereby declares that on the 14 day of April 2007, I will cause to be served, via hand delivery, a true and correct copy of **DEFENDANT'S SECOND SUPPLEMENTAL RESPONSES TO PLAINTIFF QIANYAN S. FEJERAN'S FIRST SET OF DISCOVERY REQUESTS - INTERROGATORIES; DECLARATION OF SERVICE** upon the following Counsel of record.

George L. Hasselback, Esq.
O'Connor Berman Dotts & Banes
Second Floor, Nauru Building
Post Office Box 501969
Saipan, MP 96950

DATED: April 16, 2007.


DAVID LEDGER